

The Honorable John H. Chun

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MAGDALENA K. FOSS,	)	
	)	No. 2:22-cv-01728-JHC
	)	
Plaintiff,	)	
	)	
vs.	)	STIPULATED MOTION AND
	)	ORDER TO RESCHEDULE
KING COUNTY, WASHINGTON and LAURA	)	INITIAL CASE DEADLINES
M. ALSPACH; THE CITY OF MONROE,	)	
WASHINGTON and PAUL HENDERSON,	)	<i>Noted for January 26, 2023</i>
	)	
Defendants.	)	
	)	

**STIPULATED MOTION**

The parties jointly move this court to reschedule deadlines for the Fed R. Civ. P. ("FRCP") 26(f) Conference, Initial Disclosures, and Joint Status Report.

Plaintiff filed her complaint on December 6, 2022. Dkt. 1. Defendants City of Monroe and Paul Henderson filed a Notice of Appearance (Dkts. 3-5) and intend to file a FRCP 12 motion shortly. Defendants King County and Laura M. Alspach filed a 12(b)(6) Motion to Dismiss with a noting date of February 10, 2023. Dkt. 7. On January 19, 2023, the Court issued an Order with deadlines for the FRCP 26(f) Conference, Initial Disclosures, and Joint Status Report with a FRCP 26(f) Conference deadline for February 2, 2023. Dkt. 8.

STIPULATED MOTION AND ORDER TO  
RESCHEDULE INITIAL CASE DEADLINES - 1  
(No. 2:22-cv-01728-JHC)

**Leesa Manion (she/her)**  
Prosecuting Attorney  
CIVIL DIVISION, Litigation Section  
516 Third Avenue, #W554  
Seattle, Washington 98104  
(206) 477-1120 / Fax (206) 296-0191



Given that Defendants King County and Laura M. Alspach have filed a dispositive motion before the Court, and Defendants City of Monroe and Paul Henderson intend to file a dispositive motion, the parties have conferred and are in agreement to postpone discovery, including the FRCP 26(f) Conference, Initial Disclosures, and Joint Status Report until a date after the Court rules on the Defendants' motions.

Therefore, the parties seek an Order extending the start of discovery and continuing the FRCP 26(f) Conference, Initial Disclosures, and Joint Status Report to the following:

<b><u>Event</u></b>	<b><u>Current Deadline</u></b>	<b><u>New Deadline</u></b>
FRCP 26(f) Conference	2/2/2023	4/6/2023
Initial Disclosures Deadline	2/16/2023	4/20/2023
Joint Status Report Deadline	2/23/2023	4/27/2023

The parties agree that a further extension of these initial deadlines may be necessary if the Court has not had an opportunity to rule on the dispositive motions before the new proposed deadlines approach.

STIPULATED this 26<sup>th</sup> day of January 2023.

DEAN PRATHER ESQ. PLLC

LEESA MANION (she/her)  
King County Prosecuting Attorney

/s/ Dean Prather (as per email authorization)

Dean Prather, WSBA #56335

1300 W Holly Street, #203

Bellingham, WA 98225

(360) 643-0499

[deanprather@hotmail.com](mailto:deanprather@hotmail.com)

*Attorney for Plaintiff*

/s/ Michelle Gregoire

Michelle C. Gregoire, WSBA #46467

Senior Deputy Prosecuting Attorney

516 Third Ave., #W554

Seattle, WA 98104

(206) 477-1120

[michelle.gregoire@kingcounty.gov](mailto:michelle.gregoire@kingcounty.gov)

*Attorneys for Defendants King County and  
Laura Alspach*

STIPULATED MOTION AND ORDER TO  
RESCHEDULE INITIAL CASE DEADLINES - 2  
(No. 2:22-cv-01728-JHC)

**Leesa Manion (she/her)**  
Prosecuting Attorney  
CIVIL DIVISION, Litigation Section  
516 Third Avenue, #W554  
Seattle, Washington 98104  
(206) 477-1120 / Fax (206) 296-0191



KEATING, BUCKLIN & McCORMACK,  
INC., P.S.

OGDEN MURPHY WALLACE, PLLC

/s/ Richard Jolley (as per email authorization)

Richard B. Jolley, WSBA #23473  
801 Second Avenue, Suite 1210  
Seattle, WA 98104  
(206) 623-8861

[rjolley@kbmlawyers.com](mailto:rjolley@kbmlawyers.com)

*Attorneys for Defendants City of Monroe  
and Paul Henderson*

/s/ Kari Lester (as per email authorization)

Kari I. Lester, WSBA #28396  
J. Zachary Lell, WSBA #28744  
901 5th Ave, Suite 3500  
Seattle, WA 98164  
(206) 447-7000

[zlell@omwlaw.com](mailto:zlell@omwlaw.com)

[klester@omwlaw.com](mailto:klester@omwlaw.com)

*Attorneys for Defendants City of Monroe  
and Paul Henderson*

### **ORDER**

THIS MATTER having come before the Court upon the parties' stipulation and request for a continuance of initial case deadlines; it is hereby

ORDERED that discovery be postponed and the initial case deadlines be changed as follows:

<b><u>Event</u></b>	<b><u>Current Deadline</u></b>	<b><u>New Deadline</u></b>
FRCP 26(f) Conference	2/2/2023	4/6/2023
Initial Disclosures Deadline	2/16/2023	4/20/2023
Joint Status Report Deadline	2/23/2023	4/27/2023

The parties may seek a further extension of these initial deadlines if the Court has not had an opportunity to rule on the dispositive motions before the new proposed deadlines approach.

ORDERED this 26th day of January, 2023.



The Honorable John H. Chun  
U.S. District Court Judge

STIPULATED MOTION AND ORDER TO  
RESCHEDULE INITIAL CASE DEADLINES - 3  
(No. 2:22-cv-01728-JHC)

**Leesa Manion (she/her)**  
Prosecuting Attorney  
CIVIL DIVISION, Litigation Section  
516 Third Avenue, #W554  
Seattle, Washington 98104  
(206) 477-1120 / Fax (206) 296-0191